

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CHARLES JOSEPH FREITAG, Jr., as
ADMINISTRATOR of the ESTATE OF
CHARLES JOSEPH FREITAG, SR.,**

Plaintiff,

vs.

COUNTY OF BUCKS, et al.

Defendants.

CIVIL ACTION

NO. 2:19-cv-05750

JOINT APPENDIX IN SUPPORT OF SUMMARY JUDGMENT

| Exhibit Number | Joint Appendix | Description |
|-----------------------|-----------------------|--|
| Exhibit 01 | JA0000001 | Exhibit 01 - Amended Complaint |
| Exhibit 02 | JA0000023 | Exhibit 02 - SOP B-3.23 |
| Exhibit 03 | JA0000026 | Exhibit 03 - SOP B-4.60 |
| Exhibit 04 | JA0000034 | Exhibit 04 - SOP B-4.66 |
| Exhibit 05 | JA0000041 | Exhibit 05 - Email to Deputy Warden Mitchell |
| Exhibit 06 | JA0000043 | Exhibit 06 – Dr. Cassidy Email 8.1.2018 |
| Exhibit 07 | JA0000045 | Exhibit 07 - Email between Deputy Warden Mitchell and Carl -Metellus 8.24.2018 |
| Exhibit 08 | JA0000048 | Exhibit 08 - Officer Activity Log |
| Exhibit 09 | JA0000052 | Exhibit 09 - Onisick Report |
| Exhibit 10 | JA0000058 | Exhibit 10 - Autopsy |
| Exhibit 11 | JA0000064 | Exhibit 11 - NCCHC May 2017 letter |
| Exhibit 12 | JA0000110 | Exhibit 12 - Records related to NCCHC |
| Exhibit 13 | JA0000125 | Exhibit 13 - Moody Training Transcript |
| Exhibit 14 | JA0000130 | Exhibit 14 - Murphy Training Transcript |
| Exhibit 15 | JA0000139 | Exhibit 15 - Young Training Transcript |
| Exhibit 16 | JA0000150 | Exhibit 16 - Murphy Deposition |
| Exhibit 17 | JA0000159 | Exhibit 17 - Moody Deposition |
| Exhibit 18 | JA0000174 | Exhibit 18 - Young Deposition |
| Exhibit 19 | JA0000185 | Exhibit 19 - Nottingham Deposition |
| Exhibit 20 | JA0000193 | Exhibit 20 - Mitchell Deposition |
| Exhibit 21 | JA0000197 | Exhibit 21 - Metellus Deposition |

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| Exhibit 22 | JA0000200 | Exhibit 22 - August 25, 2018 starting at 8:13 a.m. |
| Exhibit 23 | JA0000201 | Exhibit 23 - August 25, 2018 starting at 9:13 a.m. |
| Exhibit 23(a)-(l) | JA0000201(a) | Exhibit 23(a) to (l) - Screenshots of Mr. Freitag's Movement |
| Exhibit 23(m) | JA0000201(a) | Exhibit 23(m) – Screenshots of Officer Murphy Tour 10:04 a.m. |
| Exhibit 24 | JA0000202 | Exhibit 24 – August 25, 2018 Video starting at 10:13 a.m. |
| Exhibit 24(a) | JA0000202 | Exhibit 24(a) Screenshots of Officer Murphy Tour 10:21 a.m. |
| Exhibit 25 | JA0000203 | Exhibit 25 - Gravette Report and Attachments (Corrections) |
| Exhibit 26 | JA0000226 | Exhibit 26 - Perrien Report and Attachments (Correctional Psychology) |
| Exhibit 27 | JA0000267 | Exhibit 27 - Sperry Report and Attachments (Forensic Pathology) |
| Exhibit 28 | JA0000313 | Exhibit 28 - Verzilli Report and Attachments (Economics) |
| Exhibit 29 | JA0000336 | Exhibit 29 - Social Worker Case Notes |
| Exhibit 30 | JA0000339 | Exhibit 30 - Offender Management - Alerts |
| Exhibit 31 | JA0000341 | Exhibit 31 - Treatment Services |
| Exhibit 32 | JA0000345 | Exhibit 32 - Inmate monitor form (8-24 10 pm - 8-25) |
| Exhibit 33 | JA0000348 | Exhibit 33 - Bochenek 10-24-19 incident report |
| Exhibit 34 | JA0000350 | Exhibit 34 - DiSandro report re prisoner interviews |
| Exhibit 35 | JA0000352 | Exhibit 35 - Bochenek Investigation report |
| Exhibit 36 | JA0000354 | Exhibit 36 - Officer Young Incident Report |
| Exhibit 37 | JA0000356 | Exhibit 37 - Officer Moody Incident Report |
| Exhibit 38 | JA0000358 | Exhibit 38 - PrimeCare Mortality Review |
| Exhibit 39 | JA0000367 | Exhibit 39 - Penge resume |
| Exhibit 40 | JA0000370 | Exhibit 40 - Mahoney resume |
| Exhibit 41 | JA0000373 | Exhibit 41 - Annual report re PCM MH care |
| Exhibit 42 | JA0000380 | Exhibit 42 - Job descriptions |
| Exhibit 43 | JA0000389 | Exhibit 43 - Mahoney letter |
| Exhibit 44 | JA0000391 | Exhibit 44 - Suicide Prevention Policy |
| Exhibit 45 | JA0000404 | Exhibit 45 - Medical Records |
| Exhibit 46 | JA0000710 | Exhibit 46 - Photo of Cups |
| Exhibit 47 | JA0000712 | Exhibit 47 - Hugh Caldwell statement |
| Exhibit 48 | JA0000715 | Exhibit 48 - Notice of Deposition - Bucks County 30(b)(6) 2021-05-05-2 |
| Exhibit 49 | JA0000719 | Exhibit 49 - Bucks DA Report 2018-0684 |

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| Exhibit 50 | JA0000725 | Exhibit 50 - PrimeCare Email re MH Hours |
| Exhibit 51 | JA0000727 | Exhibit 51 - Brautigam Resume |
| Exhibit 52 | JA0000731 | Exhibit 52 - James Resume |
| Exhibit 53 | JA0000734 | Exhibit 53 - Notice of Deposition - PrimeCare 2021-06-09 |
| Exhibit 54 | JA0000737 | Exhibit 54 - Notice of Deposition - Bucks County 2022-04-26 |
| Exhibit 55 | JA0000740 | Exhibit 55 - Suicide Prevention Program (2019) (Bucks) |
| Exhibit 56 | JA0000752 | Exhibit 56 - Mental Health Screening and Evaluation (2019) (Bucks) |
| Exhibit 57 | JA0000756 | Exhibit 57 - Police Criminal Complaint |
| Exhibit 58 | JA0000759 | Exhibit 58-Primecare Summary of Medical Contacts |
| Exhibit 59 | JA0000761 | Exhibit 59 - Weber Deposition |
| Exhibit 60 | JA0000781 | Exhibit 60 - Mahoney Deposition |
| Exhibit 61 | JA0000787 | Exhibit 61 - Scordellis Deposition |
| Exhibit 62 | JA0000790 | Exhibit 62 - Freitag Robert Deposition |
| Exhibit 63 | JA0000797 | Exhibit 63 – Second Nottingham Deposition |

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